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9 Attorneys for Plaintiffs

10 **U.S. DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 NICOLE CLAVESILLA, an individual,
13 & ART VILLASENOR, an individual

14 Plaintiffs,

15 v.

16
17 MIDLAND CREDIT
MANAGEMENT, an incorporation,

18 Defendant.
19
20

MDL Case No.:

3:11-MD-02286-MMA-MDD

**DECLARATION OF COUNSEL
FOR PLAINTIFF NICOLE
CLAVESILLA AND PLAINTIFF
ART VILLASENOR IN RESPONSE
TO ORDER TO SHOW CAUSE**

21 TO THE CLERK OF THE COURT, ALL PARTIES, COUNSEL OF RECORD, AND
22 THE HONORABLE U.S. DISTRICT COURT JUDGE:

23 PLEASE TAKE NOTICE that counsel for PLAINTIFFS NICOLE
24 CLAVESILLA and ART VILLASENOR submit the following Declaration of Counsel
25 in response to Motion for Order to Show Cause.

26 **DECLARATION OF JARED M. HARTMAN, ESQ.**

27 I, Jared M. Hartman, Esq., declare:

28 1. I am an attorney in good standing within the State of California, and am a

1 member in good standing of this Court.

2 2. I am counsel of record in this matter for Plaintiffs.

3 3. The following declaration is of my own personal knowledge, unless
4 otherwise stated, and if called to testify as to its contents I could and would do so
5 competently.

6 4. On November 16, 2018, the Court issued an Order for Plaintiffs NICOLE
7 CLAVESILLA and ART VILLASENOR to file a Response by November 30, 2018 to
8 Defendant's Motion for Order to Show Cause. *See*, Dckt. ##615, 615-2, 616, 616-2,
9 617.

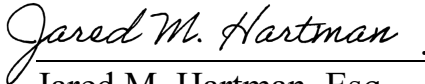
10 5. On November 27, 2018, Plaintiffs NICOLE CLAVESILLA and ART
11 VILLASENOR filed a Joint Notice of Settlement as to all claims by them against
12 Defendant in this matter. *See*, Dckt. #622.

13 6. Plaintiffs NICOLE CLAVESILLA and ART VILLASENOR and
14 Defendant are currently working together to finalize a written settlement agreement and
15 to execute the same.

16 7. After the settlement agreement and terms are executed, Plaintiffs' case will
17 be dismissed, with prejudice, with each party to bear its own costs and fees.

18 8. As such, Plaintiffs NICOLE CLAVESILLA and ART VILLASENOR
19 request that they be relieved from any further Order to Show Cause and any further
20 discovery issues, and further request that any and all pending dates/deadlines/hearings
21 be vacated as to their case, as any such matters are moot in light of the settlement and
22 eventual dismissal of Plaintiffs' claims.

23 I declare under penalty of perjury under the laws of the United States of America
24 and the State of California that the foregoing is true and correct according to the best of
25 my knowledge, and that this declaration was executed on November 30, 2018.

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27 Jared M. Hartman, Esq.
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